

Exhibit 669

PLAINTIFFS' OMNIBUS OPPOSITION TO DEFENDANTS' MOTIONS FOR SUMMARY JUDGMENT

Case No.: 4:22-md-03047-YGR

MDL No. 3047

In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA
ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION

Case No. 4:22-MD-03047-YGR

MDL No. 3047

This Document Relates to:

ALL ACTIONS

**STIPULATION PURSUANT TO FED. R.
EVID. 901(a), 803(6), AND 1002**

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES
UNLIMITED JURISDICTION

Coordination Proceeding
Special Title (Rule 3.550)

Judicial Council Coordination Proceeding
No. 5255

SOCIAL MEDIA CASES

Judge: Carolyn B. Kuhl
Dept. 12

THIS DOCUMENT RELATES TO:

ALL ACTIONS

Personal Injury and School District Plaintiffs and TikTok Ltd., TikTok LLC, TikTok Inc., ByteDance Ltd., and ByteDance Inc. ("TikTok Defendants") hereby Stipulate, with respect to the documents attached as Exhibit A and Exhibit B, as follows:

1 1. The TikTok Defendants do not object to the authenticity of the documents
2 under Federal Rule of Evidence 901(a), notwithstanding that the individual custodians of
3 such documents have not personally sponsored them through deposition testimony;

4
5 2. The TikTok Defendants do not object to the applicability of the business
6 records exception to the hearsay rule under Federal Rule of Evidence 803(6);

7 3. The TikTok Defendants do not object to the admissibility of the documents
8 under the best evidence rule, Federal Rule of Evidence 1002;

9
10 4. The TikTok Defendants reserve all other evidentiary objections they would
11 have been entitled to make if the custodian had been deposed, including objections based on
12 relevance, hearsay within hearsay, or other grounds;

13 5. The TikTok Defendants stipulate that the Account Deletion Screenshots in
14 Exhibit B are an accurate depiction of the account deletion process prior to March 26, 2025;
15 and,

16
17 6. The TikTok Defendants agree not to object to the use of these documents with
18 expert witnesses or in opening or closing arguments at trial on the grounds that the document
19 was not admitted through a fact witness, or that the custodian was not deposed or is not
20 attending trial.

21
22 **IT IS SO STIPULATED by and between the Parties,**

23 **FOR THE TIKTOK DEFENDANTS:**

24 

Dated: August 27, 2025

25
26 _____
27 Geoffrey M. Drake
28 King & Spalding LLP
Counsel for Defendants TikTok Ltd.,
TikTok LLC, TikTok Inc., ByteDance Ltd.,
and ByteDance Inc.

1 **FOR THE PI AND SD PLAINTIFFS:**

2 

3
4 _____
5 Michael M. Weinkowitz
6 MDL Plaintiff Leadership Committee
7 MDL Co-Chair of TikTok Discovery Team
8 Co-Chair of School District Committee

Dated: August 27, 2025

9 

10
11 _____
12 Andre M. Mura
13 MDL Plaintiff Leadership Committee
14 MDL Co-Chair of TikTok Discovery Committee

Dated: August 27, 2025

15 

16 _____
17 Felicia Craick
18 MDL PSC Member
19 JCCP Chair of TikTok Discovery Committee

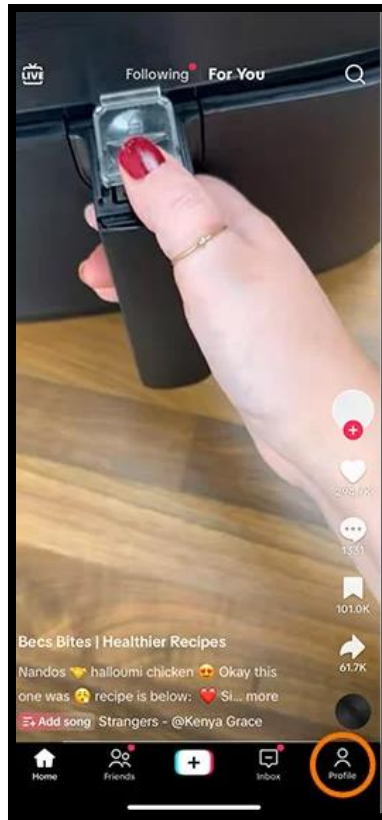
Dated: August 27, 2025

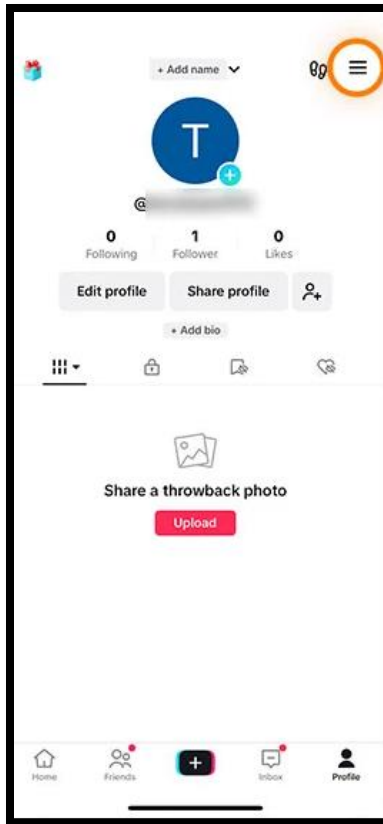
Exhibit A

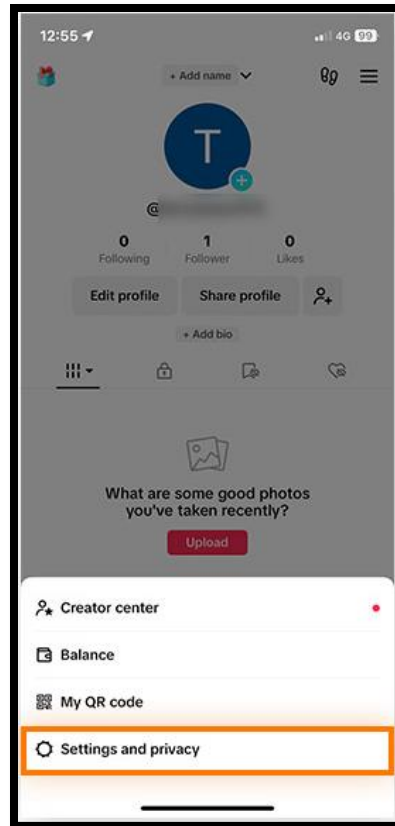
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5. TIKTOK3047MDL-015-00331396
6. TIKTOK3047MDL-004-00217083
7. TIKTOK3047MDL-002-00077141
8. TIKTOK3047MDL-004-00142160
9. TIKTOK3047MDL-004-00141938
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12. TIKTOK3047MDL-004-00141761
13. TIKTOK3047MDL-004-00141860
14. TIKTOK3047MDL-004-00141767
15. TIKTOK3047MDL-017-00361054
16. TIKTOK3047MDL-017-00361056
17. TIKTOK3047MDL-004-00141763
18. TIKTOK3047MDL-004-00141769
19. TIKTOK3047MDL-004-00141766
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26. TIKTOK3047MDL-004-00141727
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28. TIKTOK3047MDL-004-00141758
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31. TIKTOK3047MDL-004-00141752
32. TIKTOK3047MDL-004-00141750
33. TIKTOK3047MDL-004-00141745
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35. TIKTOK3047MDL-004-00141738
36. TIKTOK3047MDL-004-00142223
37. TIKTOK3047MDL-006-00326006
38. TIKTOK3047MDL-028-00829948
39. TIKTOK3047MDL-044-00846111
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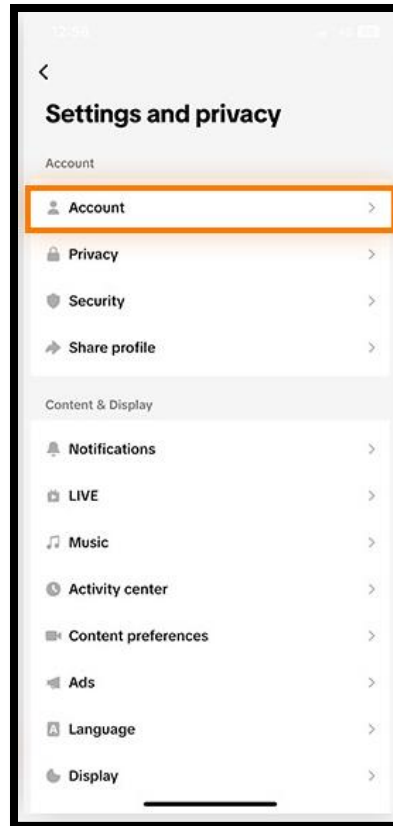
- 43. TIKTOK3047MDL-004-00141980
- 44. TIKTOK3047MDL-004-00142240
- 45. TIKTOK3047MDL-016-00354822
- 46. TIKTOK3047MDL-004-00141789
- 47. TIKTOK3047MDL-004-00141794
- 48. TIKTOK3047MDL-004-00141932
- 49. TIKTOK3047MDL-004-00142000
- 50. TIKTOK3047MDL-004-00141765

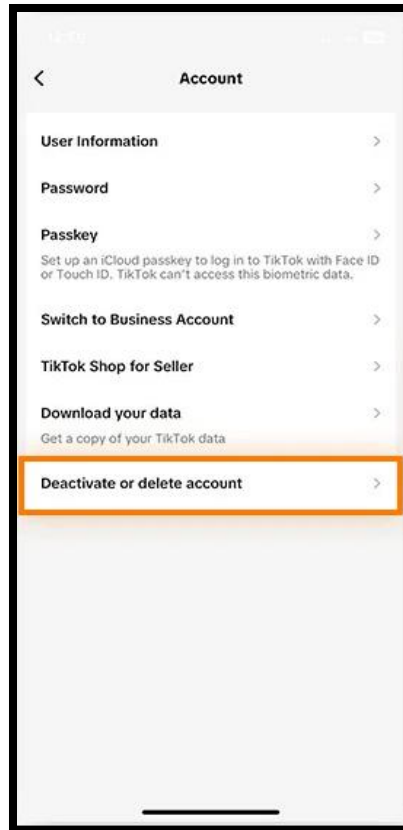
Exhibit B

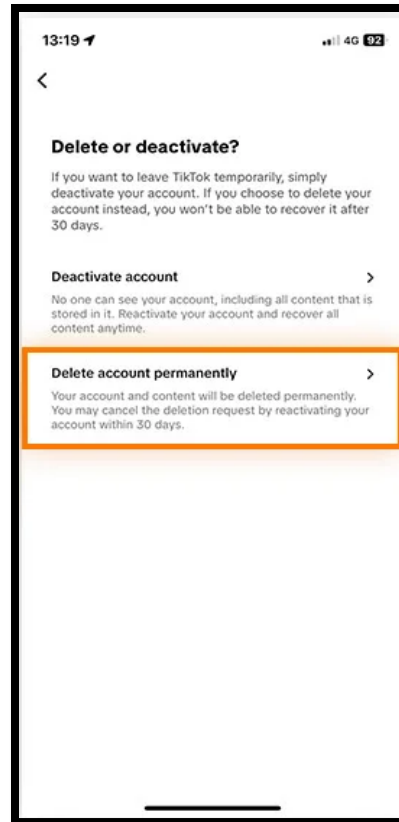












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Skip

Why are you leaving TikTok?
We're sorry to see you go! We'd love to know why you want to delete your account, so we can improve the app and support our community.

I'm leaving temporarily

☐

I'm on TikTok too much

☐

Safety or privacy concerns

☐

Too many irrelevant ads

☐

Trouble getting started

☐

I have multiple accounts

☐

Another reason

☐

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